

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

FRANCIS WHITE,  
FREDERICK SIMONE and  
VINCENT GIOACHINNI

Criminal No. 03-CR-10356-MLW

**EMERGENCY MOTION FOR FURLOUGH**

Defendant Francis White respectfully requests that this Honorable Court enter an Order requiring the Federal Bureau of Prisons to allow him to be released on a compassionate furlough. In support, he states as follows:

1. On March 11, 2006, this Court sentenced Mr. White to, *inter alia*, a 30 month term of custody. Mr. White is currently serving that sentence at the federal prison camp in Lewisburg, Pennsylvania.
2. Prior to being sentenced, and as described in Mr. White's motion for pretrial release, Mr. White was his mother's legal guardian and visited her every day at the nursing home where she resided. *See* Exh. A (excerpt from Mr. White's opposition to prosecution's motion for pretrial detention).
3. Mr. White's mother is severely ill. Her doctor writes, "her condition is not improving. Considering her severe heart disease, GI and renal problems and high risk for future stroke we recommended hospice care to the family." Exh. B. Mr. White and his family expect her to pass away in the coming days.

4. Mr. White filed a request for a furlough with the Bureau of Prisons, explaining his mother's condition. The Bureau of Prisons denied the request.
5. Mr. White seeks a compassionate furlough to see his mother before she dies and/or to attend her funeral.

WHEREFORE, Defendant Francis White respectfully requests that this Honorable Court grant his motion.

FRANCIS WHITE,  
By his attorneys,

/s/ Richard M. Egbert  
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#### **CERTIFICATE OF SERVICE**

I, Patricia A. DeJuneas, hereby certify that I have caused a copy of the foregoing document to be served on Assistant United States Attorney Ernest DiNisco by first class mail, this 31<sup>st</sup> day of May, 2006.

/s/ Patricia A. DeJuneas  
Patricia A. DeJuneas